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8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 In re:

11 INTEGRATED PACKAGING ASSEMBLY
12 CORP.
13 DbA IPAC
Tax ID # 47-0929011

14 Debtor

Case No. 07-53563 ASW

Chapter 7

Hearing: August 31, 2010

Time: 2:15 p.m.

Courtroom 3020, 280 South First Street
San Jose, California

15 **NOTICE OF**
16 **MOTION FOR TURNOVER OF BANKRUPTCY ESTATE'S FINANCIAL RECORDS**
17 **INCLUDING ELECTRONIC RECORDS, CLIENT FILES BY ATTORNEYS**

18 TO: DEBTOR INTEGRATED PACKAGING ASSEMBLY CORP. THROUGH ITS OFFICER
AND RESPONSIBLE PERSON, VICTOR A. BATINOVICH; and
19 TO: CAMPEAU GOODSSELL SMITH L.C., attorneys for the debtor-in-possession during the
Chapter 11 Case:

20 PLEASE TAKE NOTICE that the motion of Carol Wu ("Trustee"), trustee of the above
21 referenced bankruptcy estate, served on you herewith and on other persons to whom you may have
22 delivered Debtor's recorded information, is set before the Court at the above time and place.

23 The Trustee further gives notice of her contention that the turnover and cooperation sought
24 by the motion is of the kind explicitly required of Debtors (including their controlling officers)
25 under the United States Bankruptcy Code, and of attorneys under California law, and that
26 requiring the Trustee to proceed with a contested matter in order to enlist the Court's assistance to
27 obtain property of the estate and the Debtor's recorded information may give rise to sanctions
28 and/or other relief.

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DATED: This 28th day of June, 2009.

STROMSHEIM & ASSOCIATES

/s/ Linda Sorensen
Attorneys for
CAROL W. WU, Trustee